

Letter to Hon. Brian M. Cogan  
February 17, 2022  
**Exhibit 6**

**Proposed Matters for Rule 30(b)(6) Examination of Defendant [[Bank]]**  
**(Limited to Personal Jurisdiction)**

The person(s) designated must testify about information known or reasonably available to the organization concerning the matters listed below, for the period of time from January 1, 2011 through and including December 23, 2016 (the “Relevant Time Period”). The definitions set forth in Plaintiff’s First Request for the Production of Documents Directed to Defendant [[Bank]] (dated February \_\_, 2022) are incorporated herein by reference.

1. Your practices and procedures for processing any U.S. dollar transactions originating from any accounts maintained at Your bank, including all methods by which such transfers are made, the percentage of such transfers made by each method, any monetary limit that applies to any such methods, and any standard disclosures made to Your customers about those practices and procedures.

2. All USD Accounts You maintained in the name of, or for the benefit of Defendant Qatar Charity during the Relevant Time Period, including without limitation the agreements and terms governing those Accounts, and the way in which U.S. dollars (and payments received by the ultimate beneficiary in U.S. dollars) were transferred from those USD Accounts to accounts at other financial institutions during the Relevant Time Period, including how You processed such transfers.

3. Any method other than the use of one of the accounts identified in Your response to Interrogatory 1 of Plaintiffs First Set of Interrogatories to Defendant [[Bank]] (dated February \_\_, 2022) by which, during the Relevant Time Period: (a) You received or made inter-bank payments denominated in U.S. dollars; or (b) You received or made inter-bank payments that involved the conversion of another currency into U.S. dollars or U.S. dollars into another

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currency, including, in all cases the identities of any financial institutions that facilitated such inter-bank payments.

4. The volume and characteristics of transactions for which You employed any method described in Topic 3 above as compared to the volume and characteristics of transactions for which You used the accounts identified in Your response to Interrogatory 1 of Plaintiffs First Set of Interrogatories to Defendant [[Bank]] (dated February \_\_, 2022).

5. All periodic account statements for all USD Accounts You maintained in the name of, or for the benefit of Defendant Qatar Charity during the Relevant Time Period, including without limitation an explanation of the entries on those statements.

6. Any transfer of U.S. dollars during the Relevant Time Period originating from any of the USD Accounts You maintained in the name of, or for the benefit of Defendant Qatar Charity to or for the benefit of Hamas, PIJ, any person affiliated with either of those organizations, or any charitable organizations located in the Palestinian administered territories, including to the accounts of any such entities at the Bank of Palestine or the Islamic Bank in Ramallah. (This topic includes how those transactions were processed and whether any U.S. financial institutions were involved in such transfers).

7. Your communications with Defendant Qatar Charity or [[Other Defendant Bank]] during the Relevant Time Period concerning: (a) any inter-bank transfer of U.S. dollars; (b) any correspondent, nostro, or vostro account maintained in the United States by You or [[Other Defendant Bank]]; or (c) the ability of either You or [[Other Defendant Bank]] to effectuate inter-bank transfers in United States dollars on behalf of Defendant Qatar Charity.

8. Your communications with Defendant Qatar Charity or [[Other Defendant Bank]] during the Relevant Time Period concerning Hamas, PIJ, the Individuals, Sanabel Cards or the

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transfer of funds directly or indirectly to any charitable organizations in the Palestinian administered territories.

9. Your efforts to verify the identity of Defendant Qatar Charity and the purposes for which Defendant Qatar Charity intended to, or did, use Your services, including Your efforts pursuant to Know Your Customer, Anti Money Laundering, and Counter-Terrorism Financing laws, standards, and policies and Your analysis of same.

10. **For Defendant Qatar National Bank only:** Your efforts to verify the identity of the Individuals and the purposes for which the Individuals intended to, or did, use Your services, including Your efforts pursuant to Know Your Customer, Anti Money Laundering, and Counter-Terrorism Financing laws, standards, and policies; and all documents reflecting Your analysis of same.